

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS - FORT WORTH DIVISION**

JOHN SABAL,
Plaintiff,

v.

ANTI-DEFAMATION LEAGUE,
Defendant.

§
§
§
§
§
§
§

Civil Action No. 4:23-cv-01002-O

JOINT MOTION FOR A STAY

Plaintiff John Sabal and Defendant Anti-Defamation League (collectively “the Parties”), seek a brief stay of this case. After extensive discussions, the parties have agreed in principle to a settlement. Accordingly, the parties respectfully request that the Court stay this case for three weeks while they finalize the details of and execute a settlement agreement.

Good cause exists for this stay, which will allow the parties to complete their negotiations and finalize the agreement without the inefficiencies, expense, and burden of continued litigation, including upcoming trial preparation.

This request is made in good faith and not for the purpose of delay. The stay will not prejudice any party and will aid in the efficient resolution of this case.

Respectfully submitted.

/s/ Warren V. Norred
Warren V. Norred
NORRED LAW, PLLC
515 East Border Street
Arlington, TX 76010
817.704.3984 - T
817.524.6686 - F
wnorred@norredlaw.com

COUNSEL FOR PLAINTIFF

/s/ Nathan Siegel
Nathan Siegel
DAVIS WRIGHT TREMAINE LLP
1301 K Street NW, Suite 500 East
Washington, DC 20005
202.973.4237 - T
nathansiegel@dwt.com

COUNSEL FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I certify that counsel for the parties met and conferred in good faith regarding the subject of this Joint Motion on June 17, 2025.

/s/ Warren V. Norred
Warren V. Norred

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing Motion with the Clerk of this Court by using the CM/ECF system on June 18, 2025. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Warren V. Norred
Warren V. Norred